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23 July 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20555

RECEIVED

JUL 23 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Subject: EX PARTE PRESENTATION
CC Docket No. 92-237

Dear Mr. Caton:

On July 23, 1997, representatives of Mitretek Systems met with staff from the FCC Common Carrier Bureau to discuss the Commission's pending selection of a new North American Numbering Plan Administrator. Mitretek representatives in attendance were H. Gilbert Miller, David Garbin, Andrea Cooper, and Frank Ferrante. Mitretek presented the attached material.

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in the Public Interest*

Two copies of this letter have been submitted to the Secretary of the Commission for inclusion in the public record, as required by Sec. 1.1206(a)(2) of the Commission's rules.

Sincerely,

H. Gilbert Miller

HGM/dm

cc: Marian Gordon

Attachment

No. of Copies rec'd
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The NANP Administration Challenge

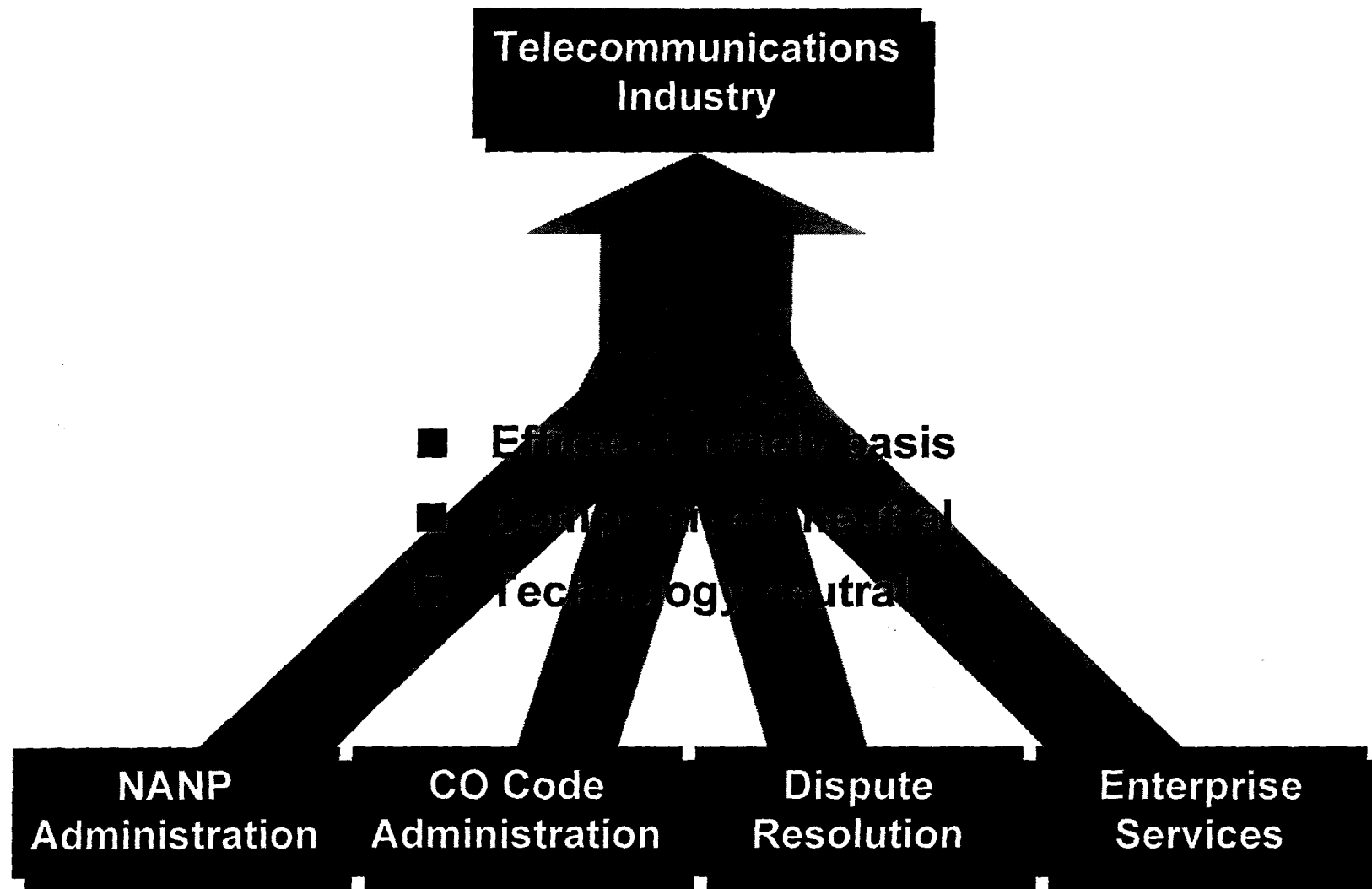
“Access to numbering resources is critical to entities desiring to participate in the telecommunications industry. Numbers are the means by which businesses and consumers gain access to, and reap the benefits of the public switched telephone network.”

Federal Communications Commission Report and Order

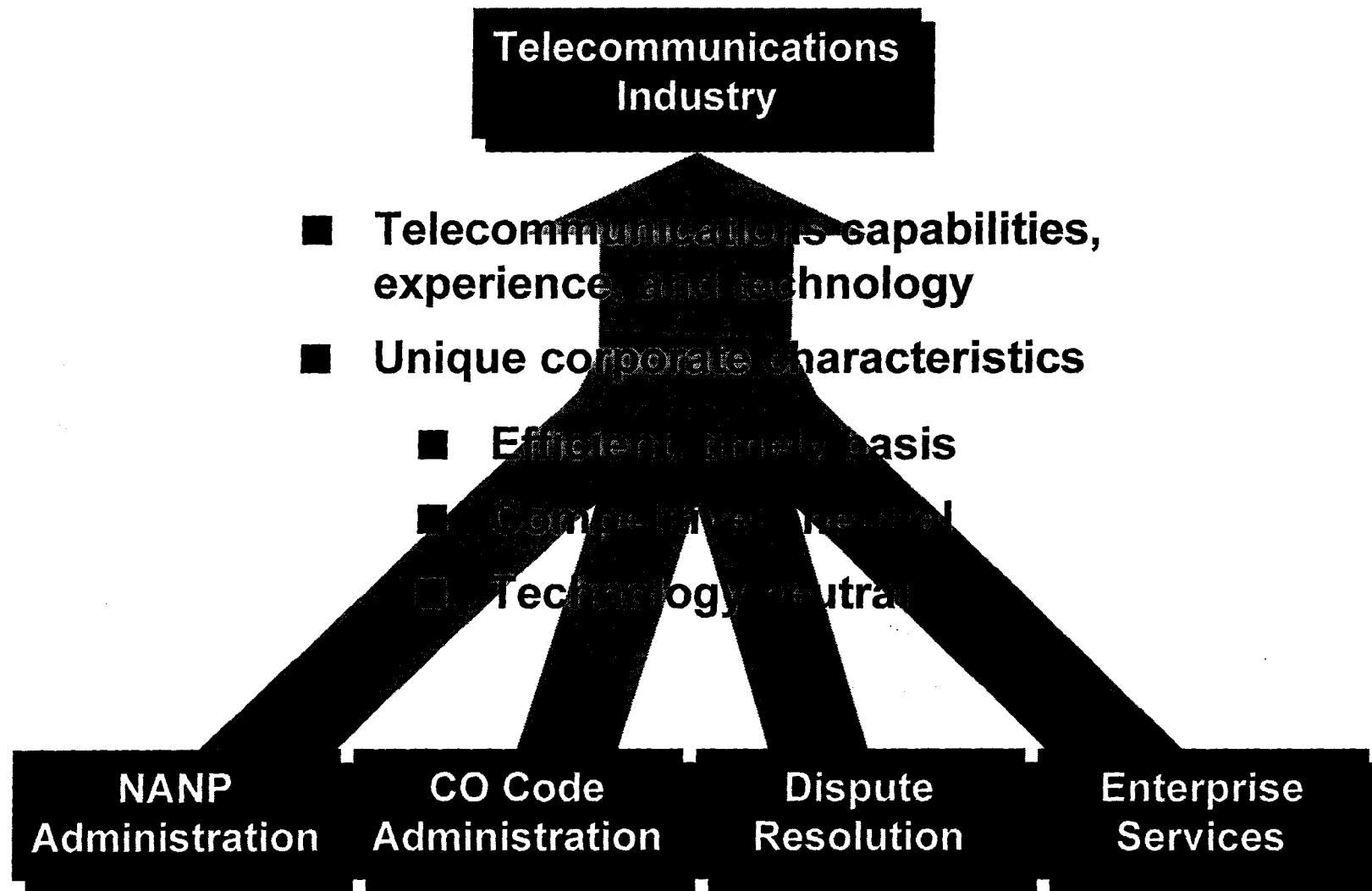
The new Administrator will assist the NANC in assuring that the North American Numbering Plan:

- Facilitates entry into the communications marketplace by making numbering resources available on an efficient, timely basis to communications service providers.
- Does not unduly favor or disfavor any particular industry segment or group of consumers.
- Does not unduly favor one technology over another.
- Gives consumers easy access to the public switched telephone network.
- Ensures that the interests of all NANP member countries are addressed fairly and efficiently, fostering continued integration of the NANP across member countries.
- Fosters international numbering consistency and interoperability.

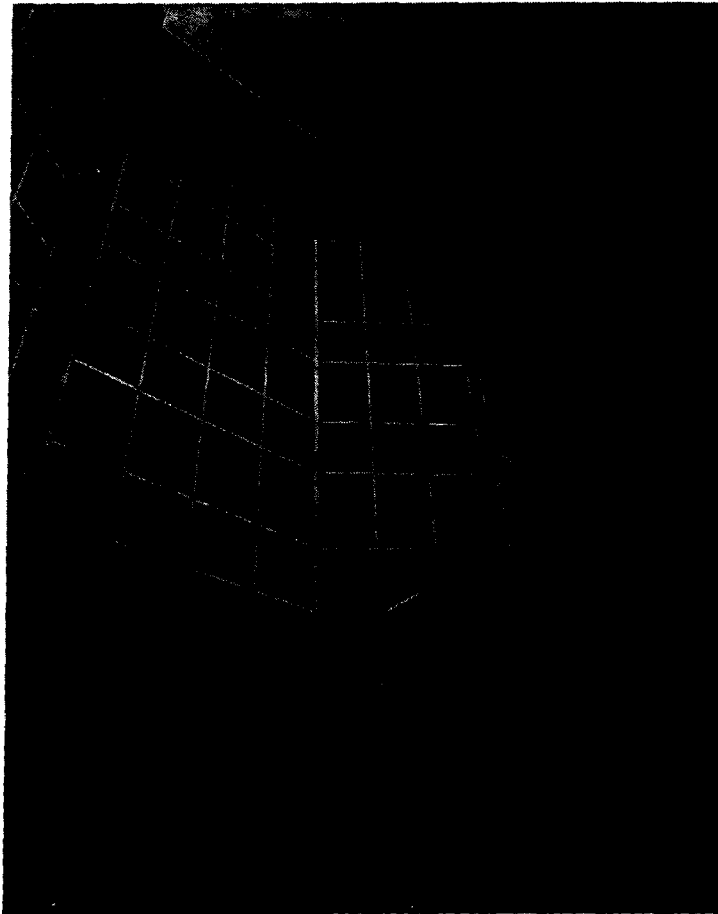
The NANP Administration Challenge - Connecting Industry and the NANP Resource



Mitretek Systems - Connecting Industry and the NANP Resource



Mitretek Systems



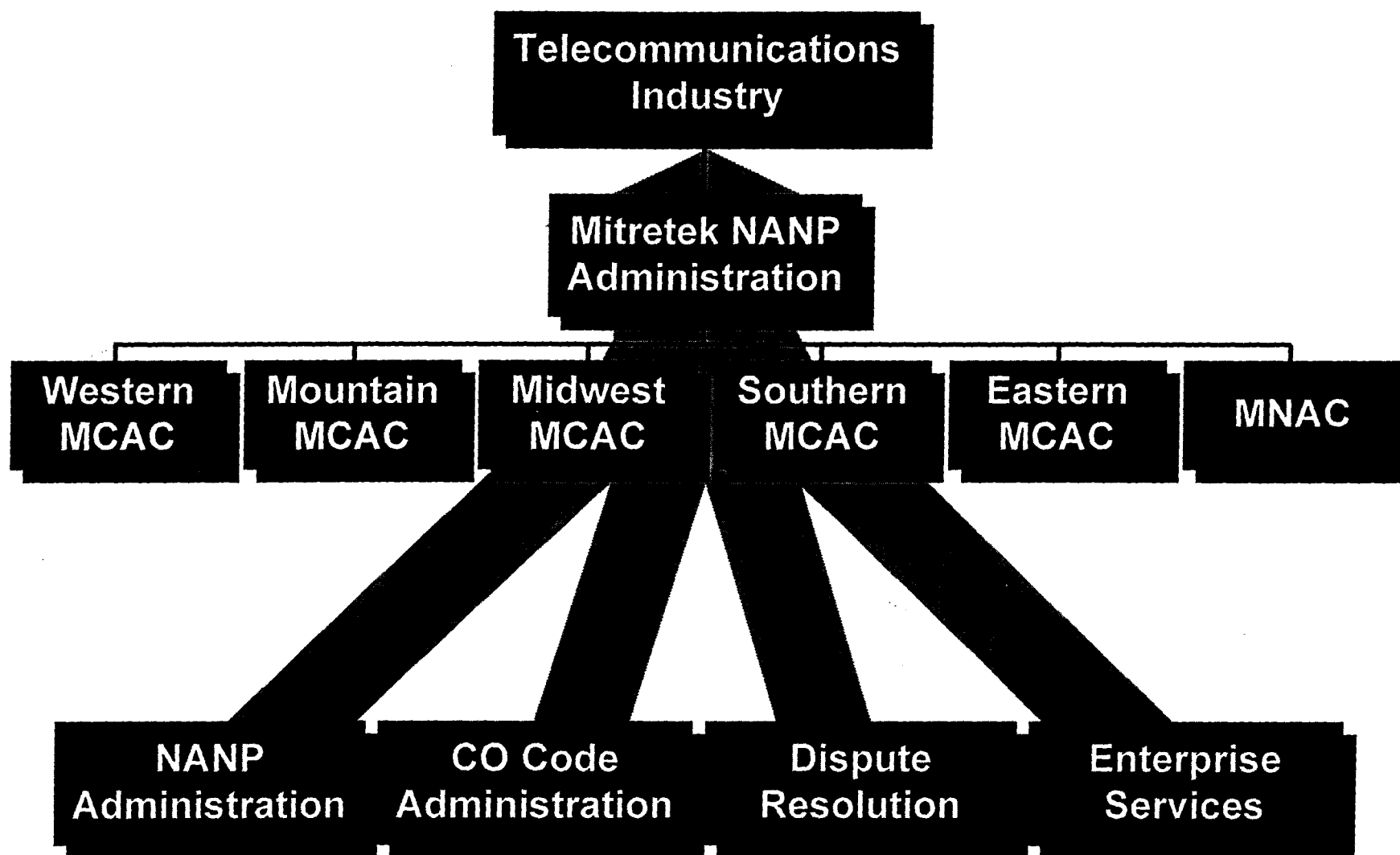
- **Purpose**

- Innovative technology in the public interest

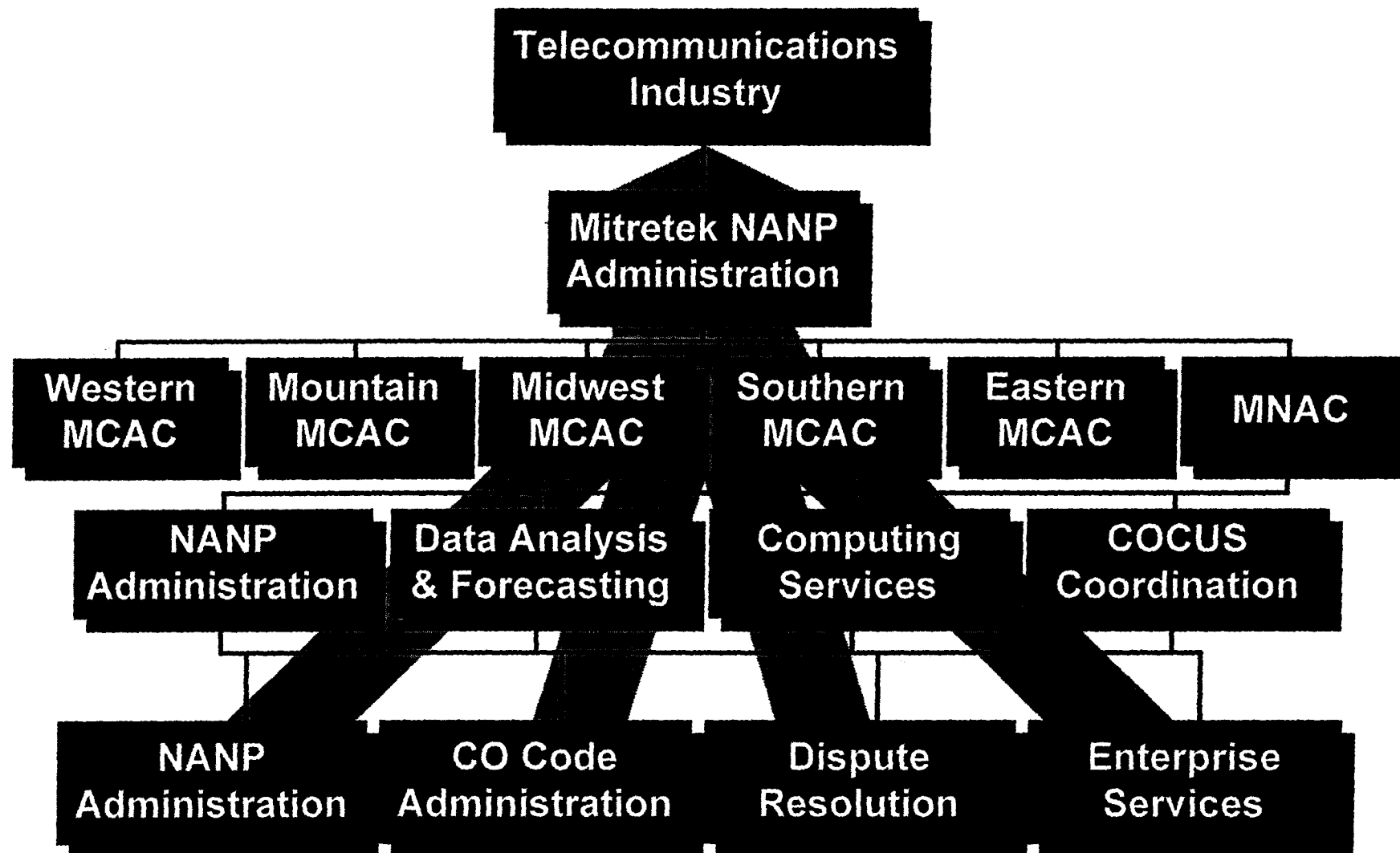
- **Characteristics**

- No private ownership rights and no stock
- No affiliations, associations, or partnerships with telecommunications providers
- Refrain from commercial activity
- Stringent conflict of interest policies
- Experienced in handling classified and proprietary information
- Performance evaluated against technical quality, utility, and responsiveness metrics

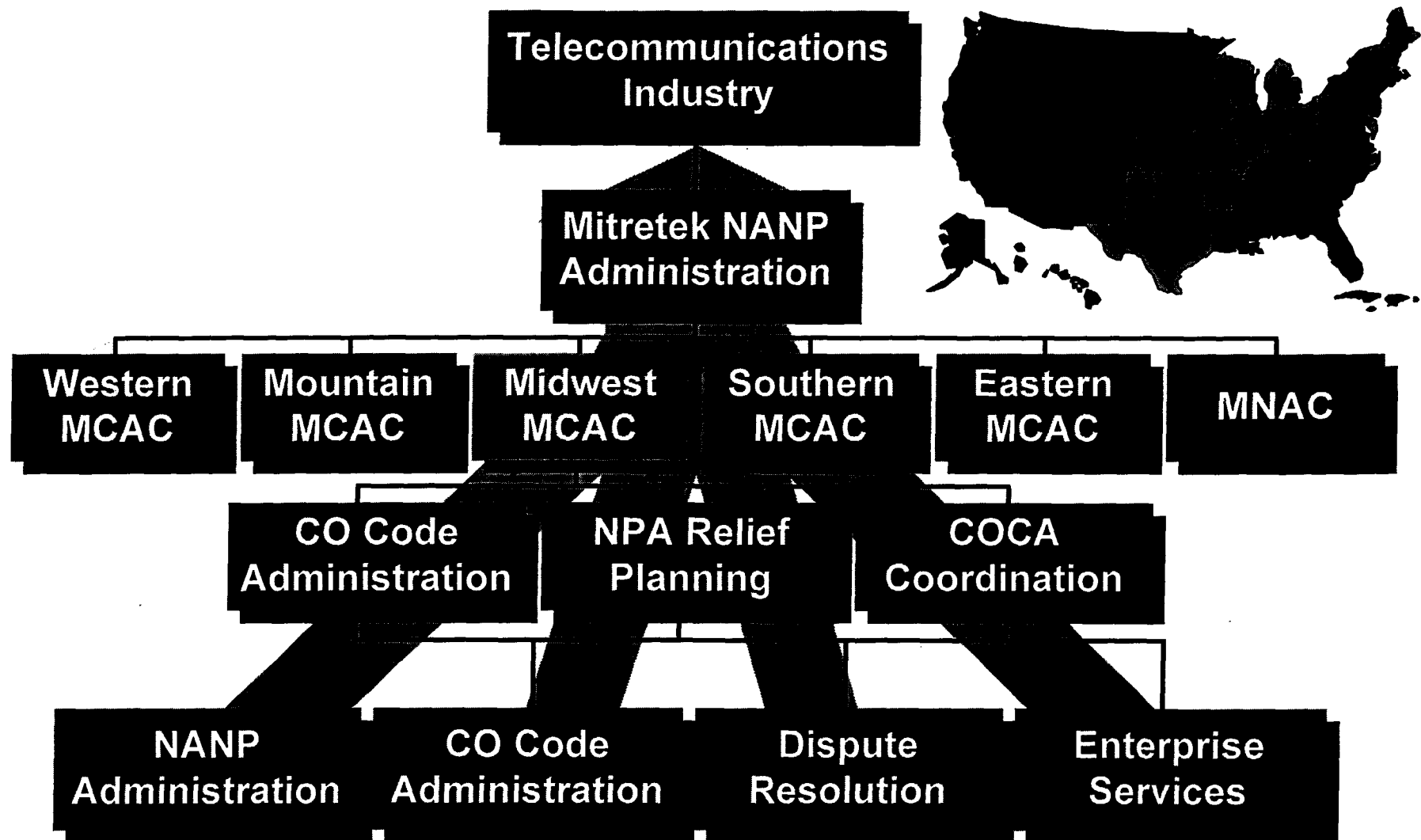
Mitretek - Connecting Industry and the NANP Resource



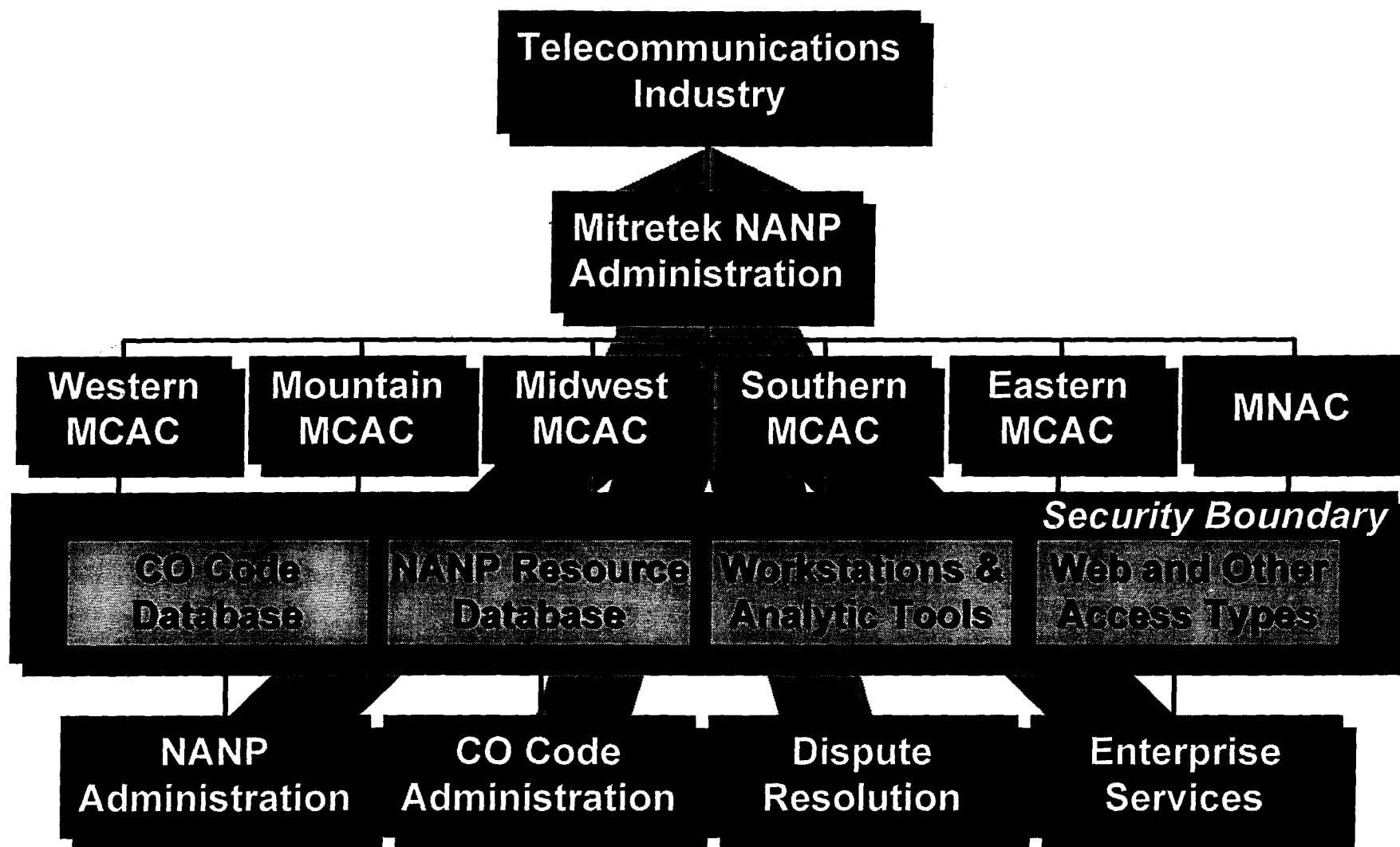
Mitretek - Connecting Industry and the NANP Resource



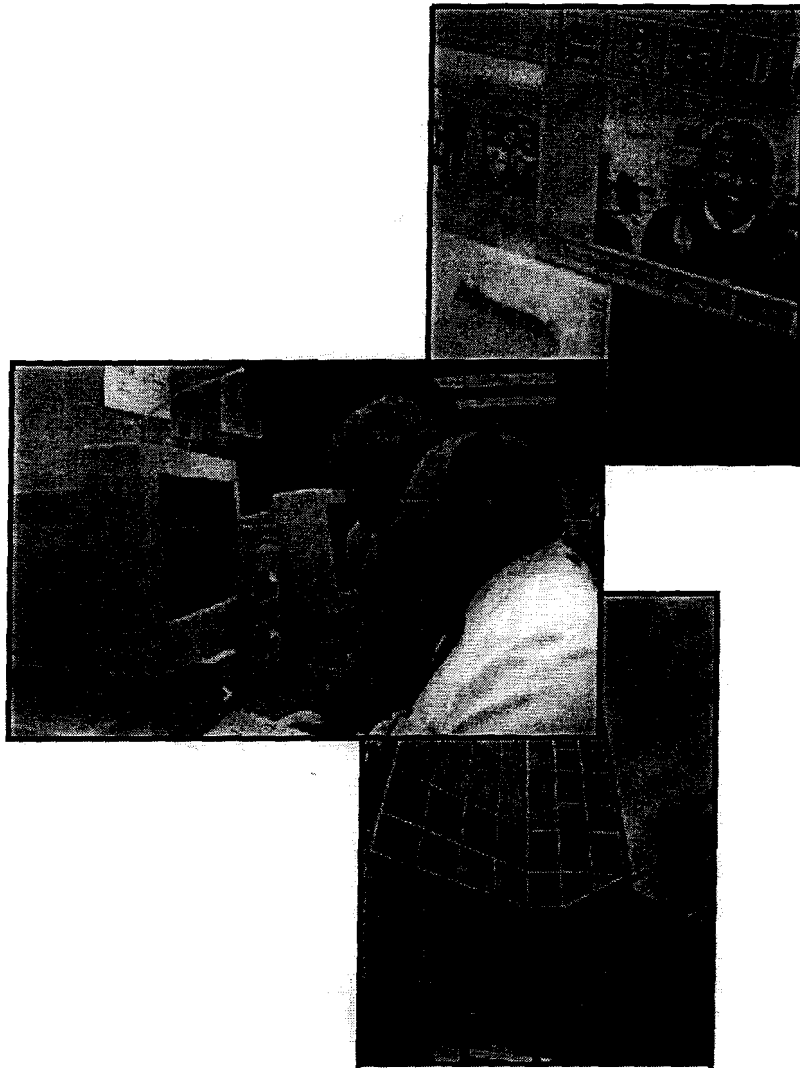
Mitretek - Connecting Industry and the NANP Resource



Mitretek - The Integrated Team Connecting Industry and the NANP Resource

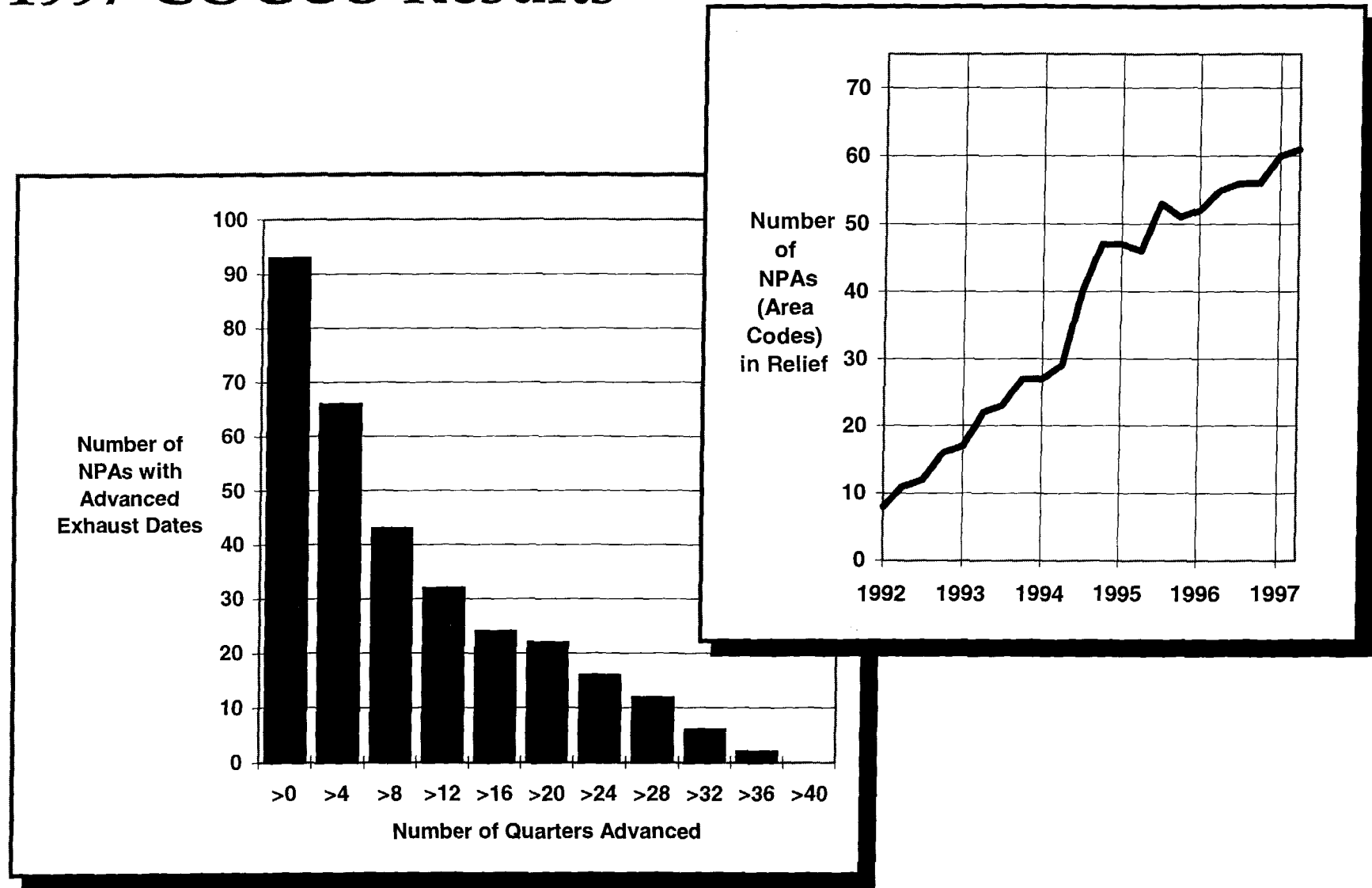


Mitretek Systems

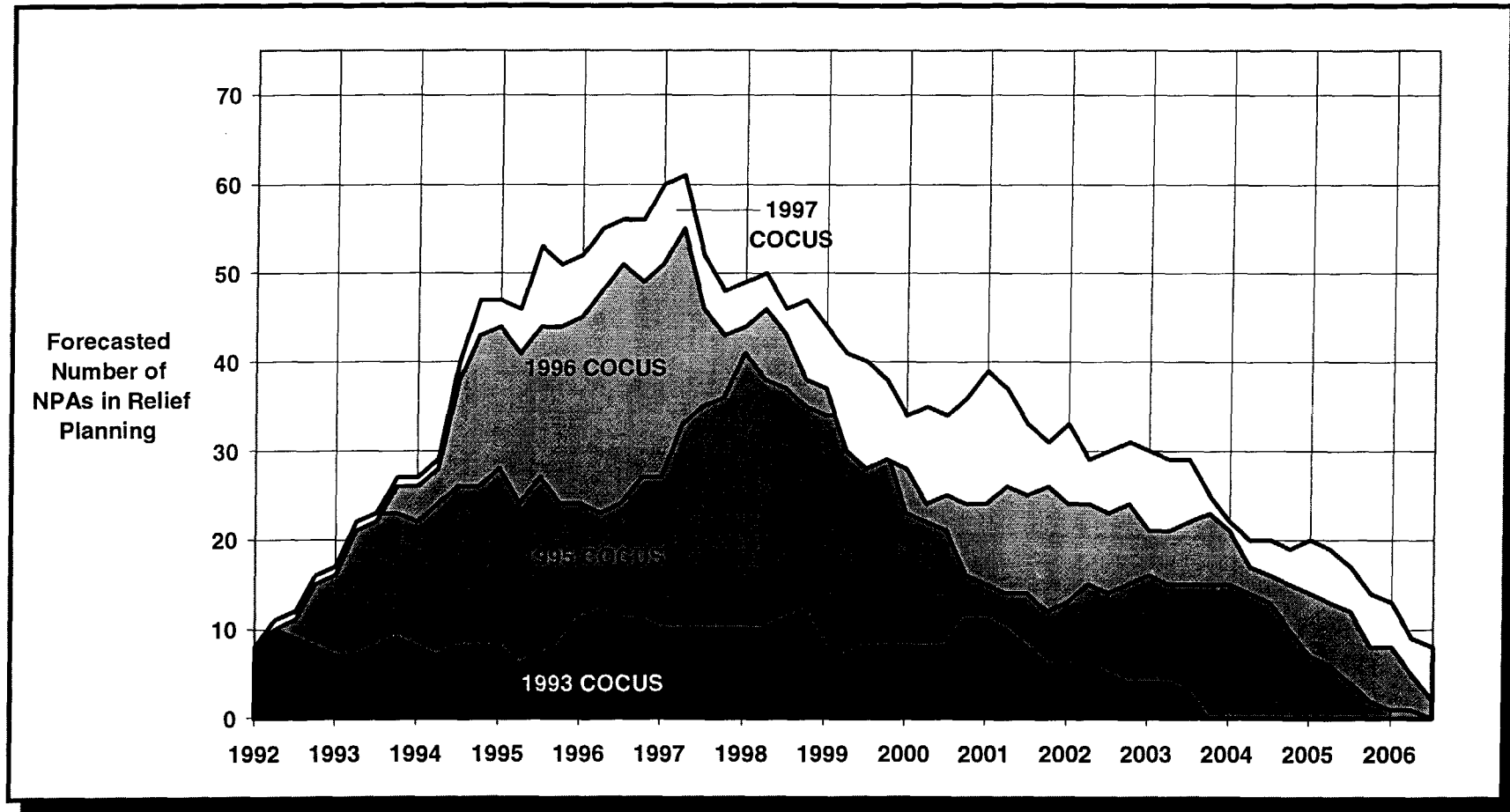


- Neutral, independent entity
- Approach built on the current guidelines
- Telecommunications and numbering plan administration experienced staff
- Information technology-based and analytically sophisticated approach
- Transition team working and ready to go
- Responsive NANP Administration organization with appropriate corporate visibility

1997 COCUS Results



1997 COCUS Results



What's the Problem?

Telecommunications Industry

- No exchange on critical data between administrators and providers
 - Neutrality
- No examination of technology and market trend data
 - Neutrality
 - Quantity of staff
 - Quality of staff
- No application of appropriate statistical tools
 - Quantity of staff
 - Quality of staff

**NANP
Administration**

**CO Code
Administration**

**Dispute
Resolution**

**Enterprise
Services**

The Record Available for the NANPA Selection

Telecommunications Industry

- Issues raised in the industry comments
 - Sufficient staff to administer the NANP
 - Proposed number of NANPA activities
 - Price difference, need to examine unit price
 - Mitretek proposal is superior or more realistic
 - Urgency of implementation
 - Neutrality
- NANC and NANPA Working Group Reports
- Proposals
- Previous record
- Federal Numbering Policy

**NANP
Administration**

**CO Code
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**Dispute
Resolution**

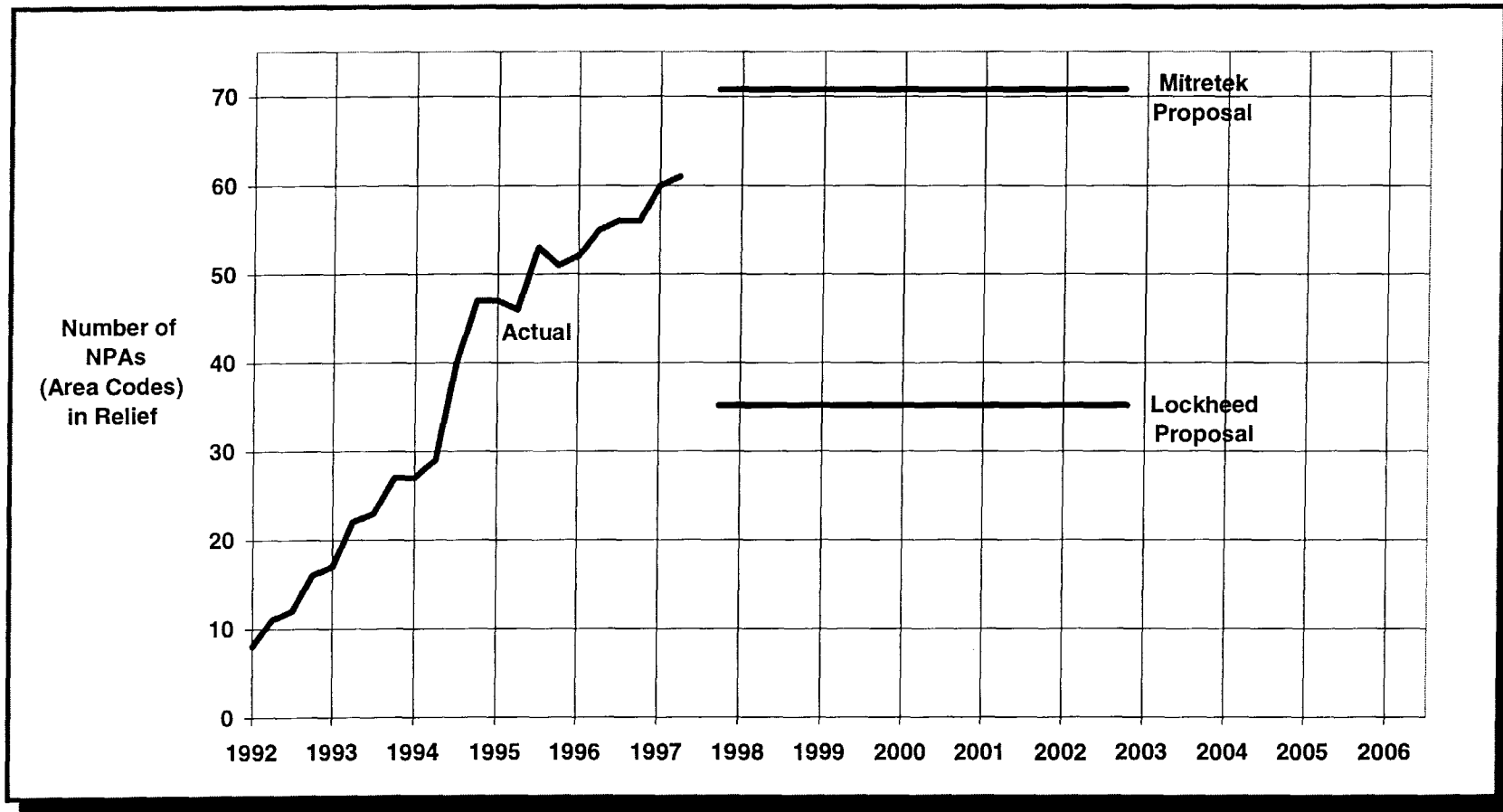
**Enterprise
Services**

Was a Sufficient Number of Staff Proposed?

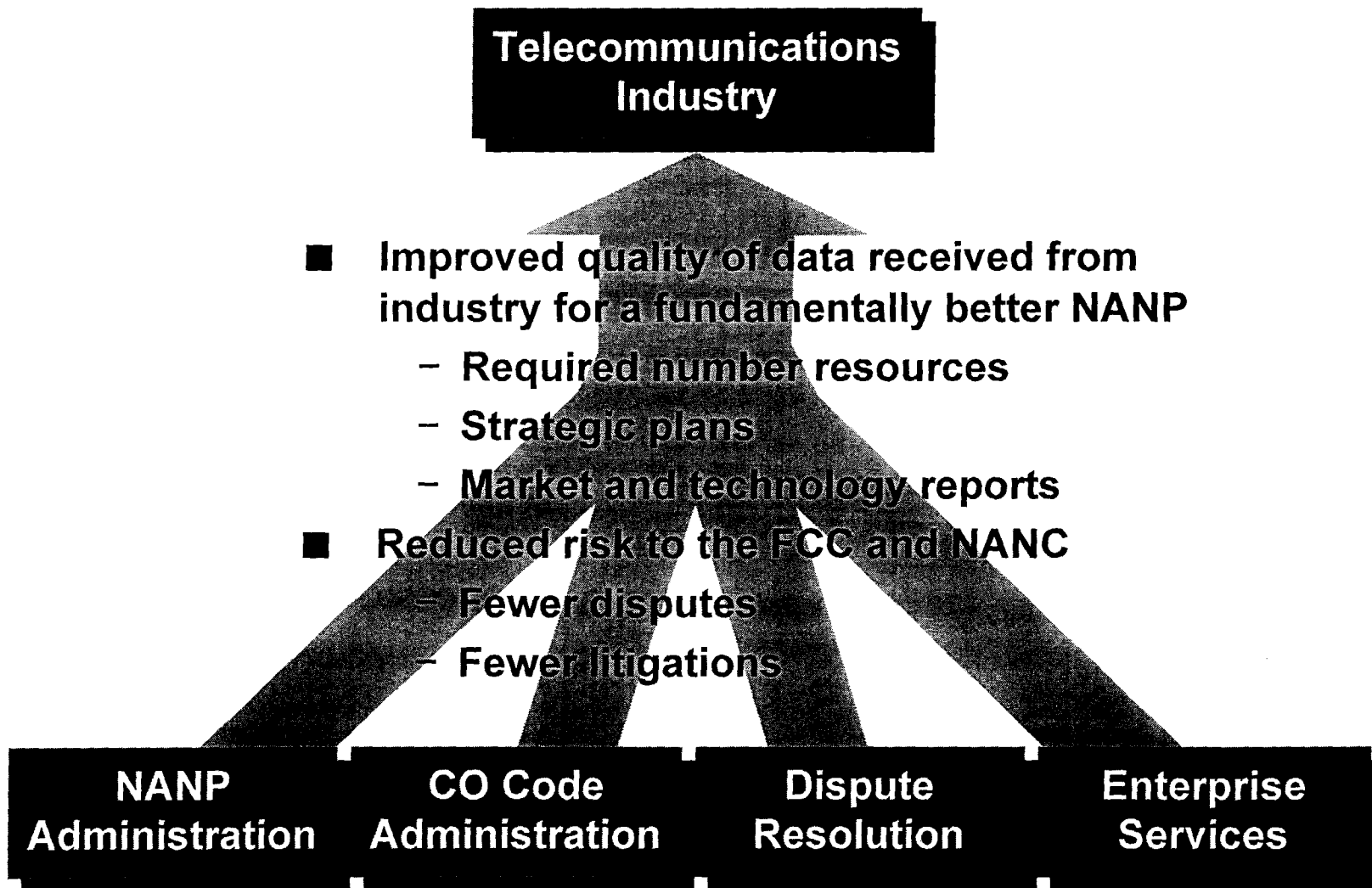
Telecommunications Industry

<i>Proposals</i>	Total Staff	CO Code Administration and NPA Relief Planning Functions	<u>Only</u> NPA Relief Planning Functions
Mitretek	53	27 plus 10 support staff	17
Lockheed	25	11	
<i>Benchmarks</i>			
FCC	40 to 50		
Incumbents		39 plus 15 support staff	
California PUC			California Only - 9
<div> <div>NANP Administration</div> <div>CO Code Administration</div> <div>Dispute Resolution</div> <div>Enterprise Services</div> </div>			

Proposed Staff Versus Number of NANPA Activities



Why is Neutrality Important?



Mitretek Recommendations

Telecommunications Industry

- Select an organization with sufficient and guideline-compliant staff levels to perform the NANP-statement requirements
- Use as the basis of selection the unit prices and recognize, as did the NANPA Working Group, that the unit prices for Mitretek and Lockheed proposals were comparable and approximately the same
- Select the organization with the proposal that received the highest 'function' score
- Recognize the uncertainty associated with number of NANPA activities and promulgate rules that will allow NANPA staff levels to adapt - But start with a sufficient level of staff

NANP
Administration

CO Code
Administration

Dispute
Resolution

Enterprise
Services

Mitretek Recommendations

Telecommunications Industry

- **Assign a high level of priority to the establishment of the new NANP Administration**
 - **Resolve to support this critical undertaking with the proper, appropriate, and necessary level of staffing, funding, and other resources**
 - **Ensure that the new NANP Administration is able to fulfill the Federal Numbering Policy**
 - **Efficient, timely basis**
 - **Competitively neutral**
 - **Technology neutral**

**NANP
Administration**

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Services**

MITRETEK S Y S T E M S

*Innovative Technology
and NANP Administration
in the Public Interest*